

15 March 2022

Dear Sirs,

**Sunnica East and West 500MW Solar Energy Farm – Registration as an Interested Party**

The Suffolk Preservation Society (SPS) acknowledges the imperative for the transition to a low carbon economy and the urgent need to provide renewable energy at pace (The Energy White Paper (2020) committed the UK to generating 40GW of offshore wind capacity by 2030; the Climate Change Committee (2019) recommended that 54GW of solar capacity is needed by 2035). Notwithstanding this, SPS's charitable objects are to protect and promote the special landscapes and heritage of Suffolk by ensuring that proposals are critically assessed and properly mitigated. SPS represents the CPRE in Suffolk. As such our comments will be restricted to the impacts of Sunnica East on Suffolk.

SPS supports the prioritization of brownfield sites for commercial solar and objects to large scale greenfield solar which ignores the 250,000 hectares of south-facing commercial roof space, which is enough to meet half the UK's electricity demand (CPRE's position on solar energy February 2022). SPS objects to the scale of this project on a greenfield site and the enormity of its environmental impact.

The landscape character of the study area is a rich mosaic of character types including Estate Sandlands, Rolling Estate Chalklands and Settled Fenlands. A predominantly flat or rolling landscape, defined by open views and wide skies, emphasised by straight roads and a regimented pattern of pine lines, shelter belts and hedges. It draws much of its character from the historical and cultural links with the horseracing industry, characterised by highly maintained "studscapes". These Breckland and Chalkland landscapes have high landscape sensitivity due to their cultural, historic and national value. It is the impact of the scattered proposals upon the rich tapestry of landscape types across such a vast area that has the potential to transform the sense of place and the experience of all those living and travelling through it.

SPS considers that this scheme lacks robust assessment, evidence-based analysis, comprehensive mitigation, and is silent on appropriate compensation for impacted communities.

Specifically, SPS objects to the proposals on the following grounds:

- i. Unprecedented scale of proposals covering almost 1000 hectares of greenfield land
- ii. Individual and cumulative impacts on landscapes and farmland
- iii. 40-year duration of the consent sought when the lifespan of the solar panels does not exceed 25 years
- iv. Harmful landscape and visual impacts upon the quality of place and significant harm to the pattern of historic landscape
- v. Adverse impact upon residential amenity and visual amenity
- vi. Adverse impact upon users of the public right of way network
- vii. Minimal levels of mitigation proposed, especially on the most sensitive receptors
- viii. Inadequate information regarding legacy benefits/environmental fund to compensate communities where impacts cannot be mitigated
- ix. A lack of detail throughout the Environmental Statement undermines a robust and meaningful assessment of impacts namely:
  - o Insufficient information on size, scale, layout and detail
  - o Insufficient information on site selection
  - o Insufficient information on landscape and visual impact
  - o Inadequate use of embedded mitigation through good design
  - o Insufficient archaeological information
  - o Inaccurate or incomplete maps, visualisations and photomontages

We urge that this poorly conceived scheme is resisted.

Yours faithfully,



**Fiona Cairns BA(Hons) DipTP DipBldgCons(RICS) MRTPI IHBC  
Director**

Ccs:

Chairman Suffolk Preservation Society, Robert Townshend

Rt Hon. Mat Hancock MP

Suffolk County Councillors

Phil Watson - Suffolk County Council Landscape Officer

Portfolio Holder for Planning, WSC

Boyd Nicholas, Principal Planner (Conservation and Design), West Suffolk

CPRE Cambridgeshire

Parish Councils – Worlington, Freckenham, Isleham, West Row, Red Lodge